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*Attorneys for Plaintiff*  
*Screen Media Ventures LLC*

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

AFTER II MOVIE, LLC, BODYGUARD  
PRODUCTIONS, INC., HITMAN TWO  
PRODUCTIONS, INC., KILLING LINK  
DISTRIBUTION, LLC, LHF PRODUCTIONS,  
INC., MILLENNIUM FUNDING, INC.,  
MILLENNIUM IP, INC., MILLENNIUM  
MEDIA, INC., MON, LLC, NIKOLA  
PRODUCTIONS, INC., OUTPOST  
PRODUCTIONS, INC., RAMBO V  
PRODUCTIONS, INC., SCREEN MEDIA  
VENTURES LLC, VENICE PI, LLC, VOLTAGE  
HOLDINGS, LLC and WONDER ONE, LLC,

Plaintiffs,

v.

RCN TELECOM SERVICES, LLC and RCN  
TELECOM SERVICES OF MASSACHUSETTS,  
LLC,

Defendants.

Civil Action No. 21-15310 (RK) (TJB)

**APPLICATION AND CERTIFICATION  
OF JAMES H. FORTE IN  
SUPPORT OF THE PRO HAC VICE  
ADMISSION OF CO-COUNSEL**

***DOCUMENT FILED ELECTRONICALLY***

**JAMES H. FORTE, ESQ.**, of full age, hereby declares as follows:

1. I am a member of the law firm of Saiber LLC, 18 Columbia Turnpike, Suite 200, Florham Park, NJ 07932. I am admitted to practice before the Courts of the State of New Jersey and the United States District Court for the District of New Jersey. I am a member in good standing

of these bars, and I am not under suspension or disbarment by these courts or by any other court or jurisdiction.

2. I submit this Certification in support of the application by Plaintiff Screen Media Ventures LLC (“SMV”) for the admission *pro hac vice* of Jonathan E. Moskin, of the law firm of Foley & Lardner LLP, 90 Park Avenue, New York, NY 10016, to appear in this action as co-counsel for SMV in this matter.

3. Pursuant to Local Civil Rule 101.1, I understand that all pleadings, briefs, stipulations, and other papers filed with the Court shall be signed by or for me or another attorney associated with Saiber LLC. Further, I agree to promptly notify the attorneys admitted *pro hac vice* of the receipt of all notices, orders and pleadings.

4. I further understand that I am responsible for the conduct of the above listed attorney admitted *pro hac vice* to appear and participate as co-counsel in this matter and will continue to make all appearances on behalf of SMV unless excused by the Court. I will ensure that the above listed attorney admitted *pro hac vice* comply with Local Civil Rule 101.1.

5. Counsel for Defendants in this matter has informed me that it has no objection to the *pro hac vice* admission of the above listed counsel and consent to the same.

6. On behalf of SMV, I respectfully request that the Court grant its application to have Jonathan E. Moskin admitted *pro hac vice* to appear and participate as their co-counsel in this matter pursuant to Local Civil Rule 101.1(c).

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

/s James H. Forte  
JAMES H. FORTE

Dated: October 16, 2023